

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SISVEL INTERNATIONAL S.A.,

Plaintiff,

v.

VERIFONE, INC.,

Defendant.

Civil Action No. 1:19-cv-1144-MN

JURY TRIAL DEMANDED

PUBLIC VERSION

Filed December 10, 2019

**DECLARATION OF NEIL A. BENCHELL IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION FOR SANCTIONS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 11**

I, Neil A. Benchell, declare and state as follows:

1. I am an attorney employed by Devlin Law Firm LLC and represent Plaintiff Sisvel International S.A. ("Sisvel") as counsel of record. I am admitted to practice law in Illinois. I have personal knowledge of the facts and matters stated herein, and, if called upon to testify as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of an excerpt of the 3GPP standard TS 22.101 v. 8.15.0 dated September 2012.

3. Attached hereto as Exhibit B is a true and correct copy of a printout of Verifone's website at: <https://www.verifone.com/sites/default/files/2017-08/ux300-ltr-1216.pdf> (last accessed December 3, 2019) with highlighting added.

4. Attached hereto as Exhibit C is a true and correct copy of an excerpt of the 3GPP standard TS 24.301 v. 11.10.0 dated March 2014.

5. Attached hereto as Exhibit D is a true and correct copy of a claim chart for U.S. Patent No. 7,274,933 showing how the patent is necessary for the 4G standard.

6. Attached hereto as Exhibit E is a true and correct copy of a claim chart for U.S. Patent No. 7,460,868 showing how the patent is necessary for the 4G standard.

7. Attached hereto as Exhibit F is a true and correct copy of a claim chart for U.S. Patent No. 7,596,375 showing how the patent is necessary for the 4G standard.

8. Attached hereto as Exhibit G is a true and correct copy of a claim chart for U.S. Patent No. 8,275,374 showing how the patent is necessary for the 4G standard.

9. Attached hereto as Exhibit H is a true and correct copy of a claim chart for U.S. Patent No. 8,472,955 showing how the patent is necessary for the 4G standard.

10. Attached hereto as Exhibit I is a true and correct copy of a claim chart for U.S. Patent No. 8,948,756 showing how the patent is necessary for the 4G standard.

11. Attached hereto as Exhibit J is a true and correct copy of a claim chart for U.S. Patent No. 8,879,503 showing how the patent is necessary for the 4G standard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of December, 2019.

/s/ Neil A. Benchell
Neil A. Benchell

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that all counsel of record are being served with a copy of this document via electronic mail on December 3, 2019.

/s/ Timothy Devlin
Timothy Devlin